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Via CM/ECF and EMAIL

Hon. Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom 12C
New York, NY 10007-1312
Tel.: (212) 805-0296
Email: WoodsNYSDChambers@nysd.uscourts.gov

MEMORANDUM ENDORSED

**Re: *United States v. Bhardwaj*, No. 1:22-cr-00398-GHW
Defendants' Unopposed Request for Extension of Time to Meet Bail Conditions**

Dear Judge Woods:

We write on behalf of all Defendants in the above-captioned matter to request a reasonable extension to August 26, 2022, for our clients to meet the bail conditions imposed by the Court during our clients' arraignment on August 2, 2022. We have conferred with the government, which consents to the requested extension.

On August 2, our clients appeared telephonically for their arraignment before the Honorable Katharine H. Parker. Judge Parker set bail conditions for each Defendant and released each on his own signature with remaining bail conditions for Defendant Abbas Saeedi to be met within 10 days [ECF No. 11], for Defendant Srinivasa Kakkera to be met within 10 days [ECF No. 19], and for Defendant Amit Bhardwaj to be met within 14 days [ECF No. 15]. Today is the tenth day since the arraignment.

Since August 2, counsel for Defendants (including newly retained counsel for Defendant Bhardwaj) have been working diligently with the government to satisfy the remaining bail conditions. Despite such efforts, Defendants require a modest extension of time to ensure compliance.

Accordingly, Defendants respectfully request an extension of time to August 26, 2022, to satisfy the Court's remaining bail conditions.

Hon. Gregory H. Woods
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Respectfully submitted,

/s/ Max C. Nicholas

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Counsel for Defendant Abbas Saeedi

Application granted. The time for the defendants to meet the remaining conditions of their pre-trial release is extended to August 26, 2022.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 29.

SO ORDERED.

Dated: August 13, 2022



GREGORY H. WOODS
United States District Judge